

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**EPIC COMPANIES, LLC,**

## Debtors.<sup>1</sup>

**JEFFREY T. VARSALONE,  
LIQUIDATING TRUSTEE,  
Plaintiff.**

**VS.**

**CENTRAL BOAT RENTALS, INC.,  
Defendant.**

—

## Chapter 11

**Case No. 19-34752 (DRJ)**

**(Jointly Administered)**

**Adv. No. 21-03893**

**STIPULATION OF DISMISSAL OF COMPLAINT TO  
AVOID AND RECOVER TRANSFERS PURSUANT TO  
11 U.S.C. §§ 547 AND 550 WITH PREJUDICE  
[Relates to Adv. Docket No. 1]**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, made applicable to this proceeding by Rule 7041 of the Federal Rules of Bankruptcy Procedure, Jeffrey T. Varsalone, as the Liquidating Trustee for the Epic Companies, LLC Liquidating Trust (the “Liquidating Trustee” or the “Plaintiff”) and Central Boat Rentals, Inc. (the “Defendant” and together with the Plaintiff, the “Parties”) file this *Stipulation of Dismissal of Complaint to Avoid and Recover Transfers Pursuant to 11 U.S.C. §§ 547 and 550 with Prejudice*.

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Epic Companies, LLC (1473), Epic Diving & Marine Services, LLC (2501), Epic Applied Technologies, LLC (5844), Epic Specialty Services, LLC (8547), Epic Alabama Steel, LLC (6835), Epic San Francisco Shipyard, LLC (5763) and Zuma Rock Energy Services, LLC (1022). The mailing address for the Debtors is: P.O. Box 79625, Houston, Texas 77279-9625.

With the consent of the Defendant, the Plaintiff hereby **DISMISSES** with prejudice the *Complaint to Avoid and Recover Transfers Pursuant to 11 U.S.C. §§ 547 and 550* [Adv. No. 21-03893, Docket No. 1] (the “Complaint”) filed against the Defendant. The Parties jointly request that the Court enter an order dismissing the Complaint with prejudice.

Dated: September 15, 2023  
Houston, Texas

**PORTER HEDGES LLP**

By: /s/ M. Shane Johnson  
John F. Higgins (TX 09597500)  
Eric M. English (TX 24062714)  
M. Shane Johnson (TX 24083263)  
1000 Main Street, 36th Floor  
Houston, Texas 77002  
Telephone: (713) 226-6000  
Fax: (713) 226-6248  
jhiggins@porterhedges.com  
eenglish@porterhedges.com  
sjohnson@porterhedges.com

**COUNSEL FOR THE PLAINTIFF**

**LUGENBUHL, WHEATON, PECK,  
RANKIN & HUBBARD**

By: /s/ Joseph P. Briggett  
Joseph P. Briggett  
601 Poydras St., Suite 2775  
New Orleans, Louisiana 70130  
Telephone: (504) 568-1990  
Fax: (504) 310-9195

**COUNSEL FOR THE DEFENDANT**

**CERTIFICATE OF SERVICE**

I certify that on September 15, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System to all parties appearing in these cases.

/s/ M. Shane Johnson  
M. Shane Johnson